

**THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Consumer Financial Protection Bureau,)	
)	
<i>Plaintiff,</i>)	Civil Action No. 3:CV-17-00101
)	(Hon. Robert D. Mariani)
v.)	
)	ORAL ARGUMENT REQUESTED
Navient Corporation, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
)	

DEFENDANTS' MOTION FOR CERTIFICATION AND STAY

Defendants Navient Solutions, LLC, Navient Corporation, and Pioneer Credit Recovery, Inc. (together, "Defendants"), by and through undersigned counsel, hereby move to certify the Court's January 13, 2021 order denying Defendants' motion for judgment on the pleadings, Doc. 558, for interlocutory appeal under 28 U.S.C. § 1292(b) and to stay proceedings in this case pending resolution of Defendants' appeal. The grounds supporting this request are set forth in Defendants' Memorandum of Law which is being filed simultaneously herewith.

Dated: January 21, 2021

Respectfully submitted,

s/ Jonathan E. Paikin

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*Counsel for Navient Corporation, Navient
Solutions, LLC, and Pioneer Credit Recovery, Inc.*

CERTIFICATE OF NON-CONCURRENCE

I hereby certify that I sought concurrence from Plaintiff's counsel in relation to this Motion. Plaintiff's counsel has not concurred in this motion.

/s/ Karin Dryhurst
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CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2021, I filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record who are deemed to have consented to electronic service.

/s/ Karin Dryhurst
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